

General Complaint

AMENDED COMPLAINT
IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS

FILED

OCT 25 2021

Clerk, U.S. District Court
Eastern District of Texas

Teri Anna Roland; **O.B.O**

A.P.M, K.S.R, K.K.R, D.K.R

Case Number : 4:21cv817

List the full name of each plaintiff in this action.

VS.

State of Texas, Sherry Shipman,

Tiffany Haertling

List the full name of each defendant in this action.

Do not use "et al".

Attach additional pages if necessary.

I. ATTEMPT TO SECURE COUNSEL:

Please answer the following concerning your attempt to secure counsel.

A. In the preparation of this suit, I have attempted to secure the aid of an attorney as follows: (circle one)

1. Employ Counsel
2. Court - Appointed Counsel
3. Lawyer Referral Service of the State Bar of Texas,
P. O. Box 12487, Austin, Texas 78711.

B. List the name(s) and address(es) of the attorney(s):

C. Results of the conference with counsel:

II. List previous lawsuits:

A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action or any other incidents? X Yes No

B. If your answer to "A" is "yes", describe the lawsuit in the space below. If there is more than one lawsuit, attach a separate piece of paper describing each.

1. Approximate file date of lawsuit: 06/01/2021

2. Parties to previous lawsuit(s):

Plaintiff Teri Anna Roland

Defendant STATE OF TEXAS, TEXAS DEPARTMENT OF FAMILY AND PROTECTIVE SERVICES,
Sherry Shipman, Tiffany Haertling

Attach a separate piece of paper for additional plaintiffs or defendants.

3. Identify the court the lawsuit was filed. If federal, name the district. If state, name the county.

 UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS

4. Docket number in other court. 421cv00415-SDJ-CAN

5. Name of judge to whom the case was assigned.

 Sean D. Jordan

6. Disposition: Was the case dismissed, appealed or still pending?

 Still Pending

7. Approximate date of disposition. N/A

III. Parties to this suit:

A. List the full name and address of each plaintiff:

Pla #1 Teri Anna Roland; O.B.O A.P.M. , K.S.R, K.K.R, D.K.R

Pla #2 _____

B. List the full name of each defendant, their official position, place of employment and full mailing address.

Dft #1: Greg Abbott; in his official capacity; Governor of Texas

P.O. Box 12548 capitol station, Austin, Texas 78711

Dft #2: Jamie Masters; in her official capacity; Commisioner of DFPS

P.O. Box 12548 Capitol Station, Austin, Texas 78711

Dft #3 Sherry Shipman; in her individual capacity,

P.O. Box 12548 Capitol Station, Austin, Texas 78711

Tiffany Haertling ; in her individual capacity,P.O. Box 12548 Austin, Texas 78711

Attach a separate sheet for additional parties.

- 1.) Defendants Unlawfully have Plaintiff's children without consent nor right.
- 2.) Defendants under color of law, deprived Plaintiff the right to access and possession of children.
- 3.) Plaintiff is entitled with impunity to access and possession of her children, life and liberty.
- 4.) The defendants have acted outside their delegated authority and injured the plaintiff.
- 5.) The plaintiff has the superior claim, interest and right to possession of her children.
- 6.) The defendants can not prove a right to possession of the plaintiff's children.
- 7.) The Plaintiff's children have suffered harm, injury and damage due to the defendants actions

V. Relief: State Briefly exactly what you want the court to do for you. Make no legal arguments and do not cite cases or statutes. Attach additional pages if necessary.

The Plaintiff ask this court to:

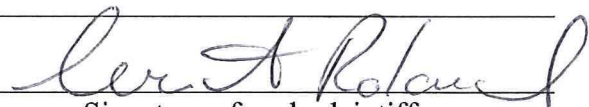
1.) issue an emergency order demanding the defendants to return children to the plaintiff without delay.

2.) issue a permanent injunction against the defendant; DFPS, prohibiting all contact with plaintiff including her children with prejudice as their services are unwanted.

Signed this _____ day of _____, 20_____.
(Month) (Year)

I declare (certify, verify or state) under penalty of perjury that the foregoing is true and correct.

Executed on: 10-25-21
Date


Signature of each plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been forwarded by first class mail [or, delivered in person] to each attorney/party of record on this 25th day of October, 2021.

Lee A. Roland

[Your signature]